



South Coast Air Quality Management District

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Mr. Michael Harrod
County of Riverside
Planning Department
4080 Lemon Street, 9th Floor
Riverside, CA 92502-1409

**Draft Environmental Impact Report (DEIR) for the
Proposed Menifee West Residential Subdivision
(TTM No. 29835, April 2005)**

Dear Mr. Harrod:

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for allowing additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The AQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:CB
RVC050412-09
Control Number

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Proposed Menifee West Residential Subdivision**

1. **Construction Emissions:** Table 4.6-4 on page 4.6-9 of the DEIR shows that NO_x and PM10 construction emissions will be significant. However, the lead agency states on page 4.6-9 that “the mobile nature of the on-site construction equipment and the off-site trucks will prevent any localized violation of the NO_x or other standards.” The SCAQMD disagrees with this statement because construction equipment, although mobile, remain at a fixed location and, therefore, could create localized air quality impacts. Offsite trucks could contribute to localized air quality impacts when they enter the construction site and idle while making a pick-up or delivery. If the lead agency wants to perform a localized air quality analysis for the proposed project’s construction site emissions, a methodology for this type of analysis can be found at the following web address: http://www.aqmd.gov/ceqa/handbook/LST/Method_Final.pdf. Otherwise, the lead agency should delete the statement about localized air quality impacts.
2. **Reducing NO_x Emissions:** For mitigation, the lead agency states on page 4.6-9 of the DEIR that, “By keeping construction equipment in good tune, average daily construction emissions can be reduced to below SCAQMD thresholds during maximum grading activity days.” Although the lead agency states that low NO_x tune-ups for heavy equipment may reduce emissions by 10 percent, it nevertheless claims that “by keeping equipment in good tune, average daily construction emissions can be reduced to below SCAQMD thresholds during maximum grading activity days.” First, keeping the engine properly tuned only produces a control efficiency of five percent. Second, reducing 455.3 pounds per day of NO_x emissions by five percent does not reduce NO_x emissions to less than 100 pounds per day, the NO_x construction significance threshold. Therefore, the last sentence on page 4.6-9 should be deleted.
3. **Reducing Diesel Particulate and Sulfur Emissions:** Mitigation Measure 4.6-3 on page 4.6-18 of the DEIR requires the developer to use particulate filters on diesel construction equipment. SCAQMD staff recommends that the lead agency replace mitigation measure 4.6-3c with the following mitigation measure, “Where diesel equipment has to be used because there are no practical alternatives, the construction contractor will use particulate filters, oxidation catalysts and low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.”
4. **Reducing VOC Emissions:** On page 4.6-10 the lead agency states that using lower volatility paint not exceeding 100 grams of VOC per liter would reduce architectural coatings by 1/3 or down to 732 pounds per day. First, unless the architectural coating is specialty coating in the Table of Standards in Rule 1113, it should already be at 100 grams per liter (flats). The reduction from 250 grams per liter to 100 grams per liter is a 60 percent reduction not a 1/3 reduction, resulting in architectural coating emission reduction of 879 pounds of VOC per day. Additional VOC emission reductions can be obtained by using architectural coatings with a lower VOC content than 100 grams per liter.

On page 4.6-10 the lead agency states that phased buildout of the project and use of the mitigation measure would reduce VOC emissions from paints to less than significant levels. Unless the lead agency explicitly establishes a phasing schedule that limits architectural coating usage, the lead agency should delete the statement that architectural coating emissions can be reduced to less than significant levels.

5. **Reducing Operational Emissions:** The project's CO, VOC and NO_x emissions all exceed the recommended operational significance thresholds. To reduce these emissions, the lead agency has proposed a number of transportation system management (TSM) measures that are listed on pages 4.6-11 and 4.6-12 of the DEIR. In addition to these measures, SCAQMD staff recommends the following mitigation measures for consideration by the lead agency:
 - Use light-colored roofing materials in construction to deflect heat away from buildings.
 - Use double-paned windows to reduce thermal loss in buildings.
 - Install automatic lighting on/off controls and energy-efficient lighting.
 - Landscape with appropriate drought-tolerant species to reduce water consumption.
6. **PM10 Emission Factor:** The lead agency notes on page 4.6-10 of the DEIR that the universal average dust emission factor for rock blasting is 50 pounds of total suspended particulates (TSP) per blast. Please provide the source of this emission factor in the Final EIR for reference.
7. **Editorial Comment:** Table 4.6-4 on page 4.6-9 of the DEIR shows the significance threshold for ROG as 7 pounds per day. The correct threshold is 75 pounds per day. Please correct this in the Final EIR.
8. **CO Hotspots Analysis:** The lead agency states on page 4.6-15 of the DEIR that a screening procedure based upon the California roadway dispersion model CALINE4 was used to determine whether there is a potential for the creation of hotspots at any of the roadway intersections close to the proposed project site. Based on the results of this screening analysis the lead agency determined that the project would not generate any adverse microscale air quality impacts. The lead agency did not provide any information on this screening procedure and so SCAQMD staff is unable to validate the results of the screening analysis. SCAQMD staff has requested information on the screening procedure, but it was not provided.